

Upthegrove, Joshua R.

From: Meyer, Ryan J.
Sent: Tuesday, May 25, 2021 4:41 PM
To: 'Furtado, Kathryn (CRM)'; 'UDHNANI, PATRICIA - US'
Cc: McCarthy, Brandon N.; 'Kosmidis, John (CRM)'; 'Rodriguez, Ashley K. - US'; 'Art@arthurwleach.com'; 'rwestling@ebglaw.com'; 'jessica@arthurwleach.com'
Subject: RE: US v. Fluitt - Satary Privilege Assertions

All,

Following up on the below, to which we never received a response, please let us know if you are available to meet and confer this week regarding Mr. Satary's improper privilege assertions. If we are unable to reach a resolution on the outstanding assertions, then we will be forced to move forward with a motion to compel the production of all communications over which privilege has been improperly asserted in the Western District by close of business on Friday, May 28.

Kind regards,

Ryan

Ryan J. Meyer
Associate

Katten

Katten Muchin Rosenman LLP
2121 North Pearl Street, Suite 1100 | Dallas, TX 75201-2591
direct +1.214.765.3627
ryan.meyer@katten.com | katten.com

From: Meyer, Ryan J.
Sent: Friday, February 19, 2021 5:07 PM
To: Furtado, Kathryn (CRM) <Kathryn.Furtado@usdoj.gov>; Riley, Rachel <rachel.riley@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@usdoj.gov>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com
Subject: RE: US v. Fluitt - Satary Privilege Assertions

All,

Please find attached for Mr. Fluitt's objections to the individual privilege assertions of Mr. Satary. Mr. Fluitt reserves the right to amend these objections based on any additional information provided by Mr. Satary or the Filter Team. In addition to the specific objections contained herein, Mr. Fluitt also objects generally to any attempt by Mr. Satary to assert privilege over communications with any attorney (or agent of any attorney) that was primarily seeking (or receiving) advice related to Mr. Satary's entities. Such assertions should be made, if at all, by Mr. Satary's entities (we understand that those entities' counsel are still compiling their finalized privilege assertions) since Mr. Satary, as an individual, lacks capacity to assert privilege on behalf of those entities.

Please let us know when we can meet and confer regarding these objections as well as the Filter Team's objections.

Kind Regards,

Ryan

Ryan J. Meyer

Associate

Katten

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ryan.meyer@katten.com | katten.com

From: Furtado, Kathryn (CRM) <Kathryn.Furtado@usdoj.gov>

Sent: Friday, February 19, 2021 8:23 AM

To: Riley, Rachel <rachel.riley@katten.com>; Meyer, Ryan J. <ryan.meyer@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>

Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@usdoj.gov>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com

Subject: RE: US v. Fluitt - Satary Privilege Assertions

EXTERNAL EMAIL – EXERCISE CAUTION

Totally understand. Hope you and your families are safe!

Best regards,
Kathryn

Kathryn Furtado
Trial Attorney
1400 New York Avenue NW
Washington, DC 20530
O: (202) 307-2884
C: (202) 794-2173

From: Riley, Rachel <rachel.riley@katten.com>

Sent: Thursday, February 18, 2021 8:40 PM

To: Furtado, Kathryn (CRM) <Kathryn.Furtado@CRM.USDOJ.GOV>; Meyer, Ryan J. <ryan.meyer@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>

Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@CRM.USDOJ.GOV>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com

Subject: RE: US v. Fluitt - Satary Privilege Assertions

Thank you, Kathryn. My apologies for all the delays, but due to the weather this week, our objections won't be ready until tomorrow. We are almost finished and are doing everything possible to get them to everyone as soon as possible. Thank you for your patience. Hope everyone is safe and warm.

Rachel Riley

Associate

Katten

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rachel.riley@katten.com | katten.com

From: Furtado, Kathryn (CRM) <Kathryn.Furtado@usdoj.gov>
Sent: Thursday, February 11, 2021 3:47 PM
To: Riley, Rachel <rachel.riley@katten.com>; Meyer, Ryan J. <ryan.meyer@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@usdoj.gov>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com
Subject: RE: US v. Fluitt - Satary Privilege Assertions

EXTERNAL EMAIL – EXERCISE CAUTION

Hi Rachel,

No objection from the Filter Team.

I've attached our questions/objections, originally provided in *U.S. v. Satary*, but that we maintain here.

Best regards,
Kathryn

Kathryn Furtado
Trial Attorney
1400 New York Avenue NW
Washington, DC 20530
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C: (202) 794-2173

From: Riley, Rachel <rachel.riley@katten.com>
Sent: Thursday, February 11, 2021 4:35 PM
To: Furtado, Kathryn (CRM) <Kathryn.Furtado@CRM.USDOJ.GOV>; Meyer, Ryan J. <ryan.meyer@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@CRM.USDOJ.GOV>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com
Subject: RE: US v. Fluitt - Satary Privilege Assertions

All,

I am filling in for Ryan Meyer while he is on family leave. With respect to the Satary log, we have a few questions that will greatly assist us in formulating objections or refraining from objecting to the contents of the log.

First, is our understanding correct that this log reflects privilege assertions on behalf of Khalid Satary individually? Second, and relatedly, there are several other parties who appear on various emails whose relationship to Satary we do not know. It would be very helpful if we could get a short explanation of who these individuals are, so that we can assess the privilege claim. I've included a list of these individuals below.

- Yolanda Nieves Yolanda Nieves yolanda@shirazholdings.com
- tommy edwards edwards_tommy41@yahoo.com
- Edward Klapp eklapp@bellsouth.net
- Greg <gregtrotta13@gmail.com>
- Andrew Cappello acappello@eloquenthealth.com

- Abdullah Ayoub abd.ayoubjor@gmail.com
- Samuel Carden sam.carden@gmail.com
- Randy Berinhout <randyberinhout@gmail.com>

This information would greatly assist us in evaluating the privilege assertions. Additionally, there's been some inclement weather in Dallas causing technology delays today (and expected to continue through the weekend). Would it be acceptable if we provide our objections by next Thursday instead of tomorrow? We would greatly appreciate it. I am available to discuss on my cell phone at 214 534 7753.

Thank you.
Rachel

Rachel Riley
Associate

Katten

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rachel.riley@katten.com | katten.com

-----Original Message-----

From: Furtado, Kathryn (CRM) <Kathryn.Furtado@usdoj.gov>
Sent: Tuesday, February 2, 2021 3:27 PM
To: Meyer, Ryan J. <ryan.meyer@katten.com>; UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Kosmidis, John (CRM) <John.Kosmidis@usdoj.gov>;
Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com;
jessica@arthurwleach.com; Riley, Rachel <rachel.riley@katten.com>
Subject: RE: US v. Fluitt - Satary Privilege Assertions

EXTERNAL EMAIL – EXERCISE CAUTION

No objection from the filter team.

Best regards,
Kathryn

Kathryn Furtado
Trial Attorney
1400 New York Avenue NW
Washington, DC 20530
O: (202) 307-2884
C: (202) 794-2173

-----Original Message-----

From: Meyer, Ryan J. <ryan.meyer@katten.com>
Sent: Tuesday, February 2, 2021 3:54 PM
To: UDHNANI, PATRICIA - US <patricia.udhnani@caci.com>
Cc: McCarthy, Brandon N. <brandon.mccarthy@katten.com>; Furtado, Kathryn (CRM) <Kathryn.Furtado@CRM.USDOJ.GOV>; Kosmidis, John (CRM) <John.Kosmidis@CRM.USDOJ.GOV>; Rodriguez, Ashley K. - US <ahamrick@caci.com>; Art@arthurwleach.com; rwestling@ebglaw.com; jessica@arthurwleach.com; Riley, Rachel <rachel.riley@katten.com>
Subject: Re: US v. Fluitt - Satary Privilege Assertions

Patricia,

We will review these, though, given the voluminous nature, we do not expect to have objections (if any) to circulate until next week. Is that acceptable to everyone?

Thanks,

Ryan

Sent from my iPhone

On Feb 2, 2021, at 11:03 AM, UDHNANI, PATRICIA - US <patricia.udhnani@caci.com> wrote:

EXTERNAL EMAIL – EXERCISE CAUTION
Counsel –

Please find attached privilege assertions from privilege holder, Khalid Satary. Pursuant to the Discovery Protocol entered in this case, we can meet and confer regarding the assertions (Protocol Section 5(b)(iii)). Counsel for Mr. Fluitt, please let us know if you object to any of the assertions and we can set up a meet & confer teleconference.

Thanks.

-Patricia Udhani

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<Privilege Log - ksatory@gmail.com (priv assertions).xlsx>

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